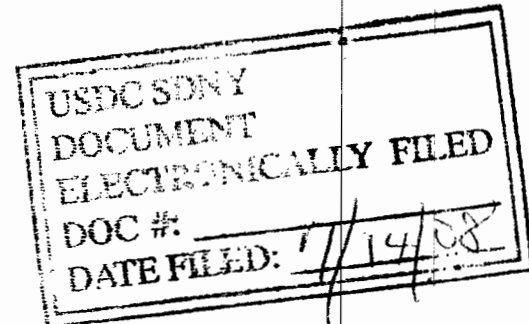


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July 14, 2008



By Fax only: 212-805-7920
Honorable Shira Scheindlin
United States District Judge
Southern District of New York
500 Pearl Street, Room 1620
New York, New York 10007

Re: United States v. Miguel Hinojosa-Quinones
08 Cr. 242 (SAS)

Dear Judge Scheindlin:

I represent Miguel Hinojosa-Quinones in connection with the referenced matter. We respectfully submit this letter to request a brief extension of time to file motions in this matter. Pursuant to the schedule set by Your Honor at the last conference the date for the defense to file motions is July 14, 2008 with the government's response due on July 28, 2008 and an evidentiary hearing to be held, if necessary on August 8, 2008.

The defense is considering whether or not to proceed with its motion - motion to suppress custodial statements - or pursue an alternate course in this matter. Since filing the motion would represent a significant step in this proceeding the defense respectfully requests four days, until Friday, July 18, 2008, to determine the course best for Mr. Hinojosa-Quinones. Counsel requires additional time to confer with Mr. Hinojosa-Quinones regarding this matter with specific reference to the defense's careful and deliberate review of any sworn statement that Mr. Hinojosa-Quinones may consider filing in support of his motion.

We ask the Court to bear in mind that Mr. Hinojosa-Quinones speaks Spanish and the need for counsel to obtain an interpreter to confer with Mr. Hinojosa-Quinones, who is detained, has complicated the logistics of engaging in attorney-client

Defense motions, if any, may be filed by July 18, 2008. So ordered. [Signature] 7/14/08

Law Office of Robert J. Krakow, P.C.

Hon. Shira Scheindlin
July 14, 2008
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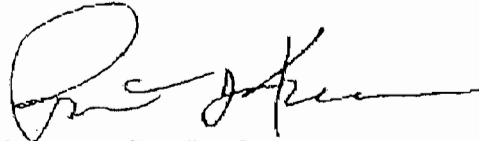
conferences, also contributing to the defense's need to make this request for a brief extension of time.

I have left a voice mail for A.U.S.A. John Cronan soliciting his consent for this request, but he is engaged in trial. I have also left a message for the A.U.S.A. who is covering for Mr. Cronan while he is engaged in trial.

We respectfully submit that the brief extension requested herein will not unduly delay the proceedings and should not operate to disturb the scheduled hearing date. Given the consequences for Mr. Hinojosa-Quinones that may attach to the decision to proceed with litigating the motion we respectfully submit that the brief extension requested herein is reasonable and, that Your Honor's grant of this request will serve the interest of justice.

Accordingly, we respectfully request that the Court permit the defense to file by July 18, 2008 the motions originally scheduled to be filed today, July 14, 2008.

Respectfully submitted,



Robert J. Krakow

cc: By Fax (212)637-2390
AUSA John P. Cronan